IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: Jamie & Tammy Atwood)	Chapter 13
Debtors)	Case No. 1:17-bk-05070
)	
M & T Bank)	
Movant)	
)	
Jamie & Tammy Atwood, Respondents)	
Charles DeHart, III, Trustee)	

DEBTORS' RESPONSE TO MOTION OF M & T BANK MOTION FOR RELIEF FROM THE AUTOMATIC STAY UNDER 11 U.S.C. 362 PURSUANT TO BANKRUPTCY PROCEDURE RULE 4001

- 1. Movant, M & T Bank, filed its Motion for Relief on June 5, 2018.
- 2. Debtors anticipated they might miss a couple of payments post-petition and placed those anticipated arrears in their original plan.
- 3. Debtors will be filing an Amended Chapter 13 plan proposing to cure the correct amount of post petition arrears through their Chapter 13 plan.
- 3. Debtors desire the opportunity to cure any post-petition mortgage arrears and keep their home.
 - 4. Debtors request the Court deny Movant's Motion for Relief.

WHERFORE, Debtors, Jamie & Tammy Atwood, pray the Court enter its order denying the Motion for Relief from the Automatic Stay that was filed on June 5, 2018 by M & T Bank.

Dated: June 19, 2018 Respectfully Submitted,

/s/Stephen Wade Parker Stephen Wade Parker (315606) Counsel for Debtor Mooney & Associates 2 S. Hanover Street Carlisle, PA 17013 Swp@mooney4law.com (717) 243-4770 Phone (717) 632-3612 Fax